

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167  
Chapter 7

Debtor.

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Erik A. Ahlgren, as Chapter 7 Trustee  
of the Bankruptcy Estate of Pro-Mark Services, Inc.,  
as Administrator of the Pro-Mark  
Services, Inc. Employee Stock Ownership Plan, and  
as Trustee of the Pro-Mark Services, Inc.  
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable  
Living Trust, Kyle R. Berg Revocable Living Trust,  
Chad DuBois, and Miguel Paredes,

Defendants.

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**STIPULATED MOTION TO EXTEND BERG DEFENDANTS' DEADLINE TO FILE  
ANSWER TO PLAINTIFF'S SECOND AMENDED COMPLAINT**

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1. Plaintiff Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust filed his Second Amended Complaint against the Defendants, including Defendants Connie Berg, Kyle Berg, Connie Berg Revocable Living Trust, and Kyle R. Berg Revocable Living Trust (collectively, the "Berg Defendants"), on May 20, 2025. [ECF No. 120] (the "Second Amended Complaint").

2. Berg Defendants requested that Plaintiff stipulate to an extension of Berg Defendants' time to file an answer to the Second Amended Complaint. Plaintiff had no objection to this request.

3. Plaintiff and Berg Defendants now hereby move the Court, by stipulation, for an order extending the deadline for Berg Defendants to file an answer to the Second Amended Complaint to June 19, 2025.

Dated: May 27, 2025

/s/ Peter D. Kieselbach

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Counsel for Plaintiff

Date: May 27, 2025

/s/ Jordan E. Chavez

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*Attorneys for Defendants Connie Berg, Kyle Berg,  
Connie Berg Revocable Living Trust, Kyle R. Berg  
Revocable Living Trust*

CERTIFICATE OF SERVICE

The undersigned certifies that on May 27, 2025, the above document was served on all counsel of record via CM/ECF.

/s/ Jordan E. Chavez  
Jordan E. Chavez